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April 29, 1998

John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D. C. 20463

**RE: Huntington Bancshares Incorporated Political Action
Committee, C00165589 (HBI-PAC)
Year End Report (7/1/97-12/31/97)**

Dear Mr. Gibson:

Your letter to Jon F. Baesman, former Treasurer of HBI-PAC, under date of April 16, 1998, had been referred to this office for response.

Your letter indicates that you believe my earlier response to Mr. Scott Francis of your office under date of April 6, 1998, concerning contributions by HBI-PAC to the Voinovich for Senate Committee was incomplete since it addressed only the "in kind" contributions in the aggregate amount of \$1,354.21 which were questioned by Mr. Francis.

It is true that I did not address the additional \$2,000 in contributions made to the Friends of Voinovich Exploratory Committee during 1995. The reason these contributions were not addressed is twofold: they were not questioned by Mr. Francis; and they had previously been redesignated as contributions to the general election (see enclosed Redesignation under date of February 12, 1997) and reported as such by the Voinovich for Senate Committee. It was not the understanding of HBI-PAC that any additional reporting was necessary in light of the actions taken by the Voinovich Committee. If that understanding is incorrect in light of the enclosure, please advise.